

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

|                            |   |                       |
|----------------------------|---|-----------------------|
| -----                      | X |                       |
|                            | : |                       |
| In re                      | : | Chapter 9             |
|                            | : |                       |
| CITY OF DETROIT, MICHIGAN, | : | Case No. 13-53846     |
|                            | : |                       |
| Debtor.                    | : | Hon. Steven W. Rhodes |
|                            | : |                       |
| -----                      | X |                       |

**FINANCIAL GUARANTY INSURANCE COMPANY'S  
CERTIFICATE OF COMPLIANCE WITH THE ORDER GRANTING  
MOTION TO COMPEL FULL CLAWBACK OF DEBTOR'S DOCUMENT  
PRODUCTION AND RELATED RELIEF**

In accordance with this Court's Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief dated May 13, 2014 (the "**Clawback Order**"), Financial Guaranty Insurance Company ("**FGIC**"), by and through its counsel, Weil, Gotshal and Manges, LLP ("**Weil**"), hereby certifies as follows:

1. On May 7, 2014, Weil received a hard drive with a document production made by the City of Detroit (the "**City Production**"). The City Production was processed and uploaded by FGIC's third party vendor for review.
2. On May 13, 2014, Weil caused the hard drive containing the City Production to be returned to counsel for the City.
3. Also on May 13, 2014, Weil instructed its internal litigation support group and FGIC's third party vendor to purge the City Production from their systems. The City Production was purged from Weil's internal systems on May 13, 2014.

4. On May 14, 2014, Weil received confirmation that the hard drive containing the City's Production had been delivered to counsel for the City.

5. Also on May 14, 2014, Weil received confirmation from FGIC's third party vendor that the City Production had been purged from its systems.

6. In addition, Weil has confirmed that (i) all physical copies of the City Production or any portions thereof and (ii) all work product reflecting the contents of any document in the City Production has been destroyed.

7. Accordingly, FGIC has fully complied with each of the provisions set forth in paragraph 2 of the Clawback Order.

DATED: May 14, 2014  
Houston, Texas

/s/ Alfredo R. Pérez  
Alfredo R. Pérez  
WEIL, GOTSHAL & MANGES LLP  
700 Louisiana Street, Suite 1700  
Houston, TX 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511  
Email: [alfredo.perez@weil.com](mailto:alfredo.perez@weil.com)

– and –

Ernest J. Essad Jr.  
Mark R. James  
WILLIAMS, WILLIAMS, RATTNER &  
PLUNKETT, P.C.  
280 North Old Woodward Avenue, Suite 300  
Birmingham, MI 48009  
Telephone: (248) 642-0333  
Facsimile: (248) 642-0856  
Email: [EJEssad@wwrplaw.com](mailto:EJEssad@wwrplaw.com)  
Email: [mrjames@wwrplaw.com](mailto:mrjames@wwrplaw.com)

*Attorneys for Financial Guaranty Insurance  
Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2014 *Financial Guaranty Insurance Company's Certificate of Compliance with the Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief* was filed and served via the Court's electronic case filing and noticing system to all registered users that have appeared in this Chapter 9 proceeding.

/s/ Alfredo R. Pérez

Alfredo R. Pérez  
WEIL, GOTSHAL & MANGES LLP  
700 Louisiana Street, Suite 1700  
Houston, TX 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511  
Email: [alfredo.perez@weil.com](mailto:alfredo.perez@weil.com)

Dated: May 14, 2014